

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TASER INTERNATIONAL, INC., <i>et al.</i> ,))	
)	Case No.: 1:10-CV-03108-JOF
Plaintiffs,))	[On removal from the State
v.))	Court of Fulton County,
)	Georgia Case No.:
MORGAN STANLEY & CO., INC., <i>et al.</i> ,))	2008-EV-004739-B]
)	
Defendants.))	
)	

AFFIDAVIT OF ELIZABETH G. EAGER

Before me, the undersigned officer, duly authorized to administer oaths in the State of Georgia, came Elizabeth G. Eager, who after being first duly sworn on oath, states as follows:

1.

I am over the age of eighteen (18), am of sound mind and otherwise competent to testify, and am giving this Affidavit based upon my personal knowledge, observations and belief.

2.

I am an associate attorney at the law firm of Bondurant, Mixson & Elmore, LLP, which represents the Plaintiffs in this matter.

3.

Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Amended Responses to Defendants' Second Set of Interrogatories and Third Request for Production of Documents to All Plaintiffs. To the extent this document contains account names and account numbers, this information has been redacted.¹

4.

Attached hereto as Exhibit B is a true and correct copy of GS_T 000049- 56. This document is an NASD Letter of Acceptance, Waiver and Consent 20042000105 dated July 18, 2005.

5.

Attached hereto as Exhibit C is a true and correct copy of GS_T 000057-65. This document is an NASD Letter of Acceptance, Waiver and Consent 20050002343-01 AWC dated October 13, 2005.

¹ Defendant Deutsche Bank Securities, Inc. ("DBSI") contends that the statements on pages 154 that it "redacted the lender information in its locate records" and 116-117 identifying missing transactions in its blue sheets are no longer accurate because it has now produced complete lender information and replacement blue sheets. On October 18, 2010, Plaintiffs served a new Amended Response to Defendants' Second Interrogatories, which removed these statements. Due to time constraints associated with conferring with Defendants regarding confidentiality, Plaintiffs are unable to file the most recent version with those statements removed.

6.

Attached hereto as Exhibit D is a true and correct copy of GS_T 000068-73.

This document is an NASD Letter of Acceptance, Waiver and Consent.

7.

Attached hereto as Exhibit E are true and correct copies of GS_T 000133-34 and 135-136. These documents are letters from FINRA to Goldman Sachs dated January 29, 2009. While Goldman Sachs originally designated this document as confidential, on October 18, 2010, it agreed to remove the confidentiality designation.

8.

Attached hereto as Exhibit F is a true and correct copy of GS_T 000196-205. This document is a New York Stock Exchange Hearing Decision in 10-NYSE-11 dated May 3, 2010.

9.

Attached hereto as Exhibit G are a true and correct copies of GS_T 000095-96 and 97-98. These documents are letters from the NASD to Goldman Sachs dated July 10, 2006. While Goldman Sachs originally designated this document as confidential, on October 18, 2010, it agreed to remove the confidentiality designation.

10.

Attached hereto as Exhibit H is a true and correct copy of GS_T000220-27.

This document is a May 2010 Cease and Desist Order from the Securities and Exchange Commission.

11.

Attached hereto as Exhibit I is a true and correct copy of GS_T 000074-83.

This document is a New York Stock Exchange Hearing Decision in 06-128 dated June 28, 2006.

12.

Attached hereto as Exhibit J is a true and correct copy of GS_T 000100-107.

This document is an NASD Notice and Letter of Acceptance, Waiver and Consent 20050023340-01 AWC dated July 20, 2006.

13.

Attached hereto as Exhibit K is a true and copy of the Corrected Amended Notice to Take O.C.G.A. § 9-11-30(b)(6) Deposition of Defendant Goldman Sachs, which Plaintiffs served on August 11, 2010.

14.

Attached hereto as Exhibit L is a true and correct copy of the Amended Notice to Take O.C.G.A. § 9-11-30(b)(6) Deposition of Defendant Deutsche Bank Securities, Inc., which Plaintiffs served on August 10, 2010.

15.

After Plaintiffs served Exhibit K, referenced above, we continued to negotiate with Goldman Sachs regarding the 30(b)6 notice. Attached hereto as Exhibit M is a true and correct copy of Plaintiffs' proposal to Goldman Sachs regarding the 30(b)(6) notice.

16.

Attached hereto as Exhibit N is a true and correct copy of Exhibit A to the 30(b)(6) Notice that Goldman proposed.

17.

Attached hereto as Exhibit O is a true and correct copy of an August 10, 2010 email from Elizabeth Eager to counsel for DBSI.

18.

Attached hereto as Exhibit P is a true and correct copy of an August 11, 2010 email from Steven Rosenwasser to counsel for DBSI.

FURTHER AFFIANT SAYETH NOT.

Elizabeth G. Eager
Elizabeth G. Eager

Sworn to and subscribed before me
this 19-day of October, 2010.

Tanya C. Reed
Notary Public

My Commission Expires:

